

III.

Defendant further submits that it will pay all court costs and debts incurred by reason of this removal proceeding should the Court determine that this action is not removable or is improperly removed. Furthermore, a written notice of the filing of the Petition has been given to all adverse parties.

IV.

There are no other Defendants in this matter and therefore the filing of a Joinder for Removal will not be necessary.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that the above entitled and numbered cause now pending in the 225th Judicial District Court of Bandera County, Texas be removed to this Court.

Respectfully submitted,

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BY: //s// Charles S. Frigerio

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Lead Counsel

HECTOR X. SAENZ

SBN: 17514850

ATTORNEYS FOR DEFENDANTS

BEXAR COUNTY APPRAISAL DISTRICT AND

MICHAEL AMEZQUITA

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Defendant **BEXAR COUNTY APPRAISAL DISTRICT** and **MICHAEL AMEZQUITA'S** Notice of Removal has been electronically filed on December 28, 2020 via CM/ECF has been forwarded by electronic mail to the ECF Participant:

Mr. Edward L. Pina
Edward L. Pina & Associates, P.C.
The Ariel House
8118 Datapoint Drive
San Antonio, Texas 78229-3268

Email: epina@arielhouse.com

//s// Charles S. Frigerio
CHARLES S. FRIGERIO

VERIFICATION

STATE OF TEXAS *
 *
COUNTY OF BEXAR *

BEFORE ME, the undersigned authority, on this day personally appeared **CHARLES S. FRIGERIO**, known to me to be a credible person, and upon his oath, stated as follows:

That he is a Trial Attorney and licensed to practice law in the State of Texas;

That he is an attorney of record for Defendant, **BEXAR COUNTY APPRAISAL DISTRICT AND MICHAEL AMEZQUITA, INDIVIDUALLY** in the foregoing entitled and numbered cause, and has read the foregoing Defendant's Petition for Removal; and,

That the information contained therein is within his personal knowledge and true and correct.

CHARLES S. FRIGERIO

SUBSCRIBED AND SWORN TO BEFORE ME by the said **CHARLES S. FRIGERIO**, on this, the 28th day of December, 2020, to certify which witness my hand and seal of office.

Notary Public In and For the State of Texas

My Commission Expires: _____